

1 RYAN L. DENNETT, ESQ.
 Nevada Bar No. 005617
 2 rdennett@dennettwinspear.com
 JENNIFER INSLEY MICHERI, ESQ.
 Nevada Bar No. 10089
 3 jinsley-micheri@dennettwinspear.com
 4 **DENNETT WINSPEAR, LLP**
 3301 N. Buffalo Drive, Suite 195
 Las Vegas, Nevada 89129
 Telephone: (702) 839-1100
 6 Facsimile: (702) 839-1113
 7 ***Attorneys for Defendant, State Farm***
Mutual Automobile Insurance Company

8
 9 UNITED STATES DISTRICT COURT
 10 DISTRICT OF NEVADA

11 TERRY GRANT KITCHENS,

12 Plaintiff,

Case No: 2:23-00545-GMN-VCF

13 vs.

14 STATE FARM MUTUAL AUTOMOBILE
 INSURANCE COMPANY, and DOES I-X, and
 15 ROE CORPORATIONS I-X, inclusive,

16 Defendants.

**STIPULATION AND ORDER TO
 CONTINUE MEET AND CONFER ON
 PLAINTIFF'S MOTION TO REOPEN
 DISCOVERY [DOC 30] WITH
 ADDITIONAL TIME TO RESPOND TO
 THE MOTION PURSUANT TO COURT
 MINUTE ORDER [DOC 31]**

18 COME NOW, the parties above named, by and through counsel, and submit the instant
 19 Stipulation in accordance with the June 17, 2024 Minute Order of The Honorable Magistrate
 20 Judge Elayna J. Youchah [Doc 31], and submit the within Stipulation and proposed Order for
 21 extended time to complete party briefing on the Motion [Doc 30], should the parties be unable to
 22 reach an agreement regarding the relief requested by Plaintiff within the Motion [Doc 30],
 23 following further discussions in an effort to resolve party differences.

24 The parties have met and conferred in accordance with the Minute Order [Doc 31] and
 25 agree that an extension of the briefing schedule is warranted so that the parties may continue
 26 discussions to potentially reach party agreement on Plaintiff's request presented in the Motion
 27 [Doc 30] pursuant to this Court's Minute Order [Doc 31]. With that said, should the party
 28

discussions not resolve the issue, the parties request an Order that supplemental briefing/opposition to Plaintiff's Motion to Reopen Discovery [Doc 30] be extended by 14-days, which would then make respective briefing due by July 15, 2024.

In addition, the parties further request that Plaintiff's time to respond to Defendant's pending Motion for Summary Judgment [Doc 26], also be extended.

PROPOSED SCHEDULE FOR COMPLETING REMAINING BRIEFING:

The parties hereby stipulate and request that briefing dates in this matter on Plaintiff's Motion to Reopen Discovery [Doc 30] be continued for an additional (14) days, and Plaintiff's Response to Defendant's Motion for Summary Judgment [Doc 26] to July 22, 2024.

CURRENT DATE	PROPOSED DATE
Supplemental Briefing/Opposition to Plaintiff's Motion to Reopen [Doc 30]: July 1, 2024	July 15, 2024
Response to Defendant's Motion for Summary Judgment [Doc 26]: June 26, 2024	July 22, 2024

DATED: 6/20/2024

DATED: 6/20/2024

HANRATTY LAW GROUP

DENNETT WINSPEAR, LLP

By /s/ Ani Biesiada
 KEVIN M. HANRATTY, ESQ.
 Nevada Bar No. 7734
 ANBAEITA BIESIADA, ESQ.
 Nevada Bar No. 14347
 1815 Village Center Circle, Ste 140
 Las Vegas, Nevada 89134
 Telephone: 702-821-1379
Attorneys for Plaintiff,
Terry Kitchens

By /s/ Jennifer Insley Micheri
 JENNIFER INSLEY MICHERRI, ESQ.
 Nevada Bar No. 10089
 3301 N. Buffalo Drive, Suite 195
 Las Vegas, Nevada 89129
 Telephone: 702-839-1100
Attorneys for Defendant, State Farm
Mutual Automobile Insurance Company

ORDER

IT IS SO ORDERED.

DATED: June 22, 2024


 U.S. MAGISTRATE JUDGE